

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	20 CR 362
v.	)	Judge Jorge L. Alonso
	)	
AHMED al-SHAHMAN	)	
	)	
Defendant.	)	

**DEFENDANT'S MOTION TO PROCEED BY VIDEOCONFERENCE**

Defendant, **Ahmed al-Shahman**, by and through his attorneys, **the Law Office of Damon M. Cheronis**, pursuant to the CARES Act § 15002(b)(2)(A), Pub. L. No. 116-136, 134 Stat. 281, respectfully requests that the Court permit the change of plea hearing in this matter to proceed by video conference.

In support of this motion, Mr. al-Shahman, through counsel, submits the following:

1. On November 19, 2020, Mr. al-Shahman was charged by superseding indictment with two counts of willfully failing to file an income tax return in violation of 26 U.S.C. § 7203, and one count of willfully attempting to evade and defeat the payment of income tax in violation of 72 U.S.C. § 7201. Dkt. # 7.
2. The parties have reached a plea agreement and are prepared to set the matter for a change of plea hearing.
3. By order dated July 10, 2020, the Chief Judge found that felony pleas and felony sentencings cannot be conducted in person in this district without seriously jeopardizing public health and safety.

4. Further delay of this hearing would cause serious harm to the interests of justice.

5. Therefore, Mr. al-Shahman, through counsel, and pursuant to Section 15002(b)(2)(A) of the CARES Act, respectfully requests that the Court allow the change of plea hearing to proceed by video conferencing.

Respectfully submitted,

s/ Damon M. Cheronis

**Damon M. Cheronis**

s/ Ryan J. Levitt

**Ryan J. Levitt**

Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I, Damon M. Cheronis, hereby certify that on February 16, 2021 I electronically filed the foregoing **Motion to Proceed by Videoconference** with the Clerk of the U.S. District Court for the Northern District of Illinois, Eastern Division by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

s/ Damon M. Cheronis

Damon M. Cheronis

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